

The Honorable Judge David G. Estudillo

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GABRIELLA SULLIVAN; RAINIER ARMS,
LLC; SECOND AMENDMENT
FOUNDATION; and FIREARMS POLICY
COALITION, INC.,

Plaintiffs,

v.

BOB FERGUSON, in his official capacity as
Washington State Attorney General; JOHN R.
BATISTE, in his official capacity as Chief of the
Washington State Patrol; PATTI COLE-
TINDALL, in her official capacity as Interim
Sheriff for King County, Washington; JOHN
GESE, in his official capacity as Sheriff for
Kitsap County, Washington; RICK SCOTT, in
his official capacity as Sheriff for Grays Harbor
County, Washington; DAN SATTERBERG, in
his official capacity as County Prosecutor for
King County, Washington; CHAD M.
ENRIGHT, in his official capacity as County
Prosecutor for Kitsap County, Washington; and
NORMA TILLOTSON, in her official capacity as
County Prosecutor for Grays Harbor County,
Washington,

Defendants.

No. 3:22-cv-5403-DGE

DECLARATION OF ANN
SUMMERS IN SUPPORT OF KING
COUNTY DEFENDANTS' RULE
12(C) MOTION TO DISMISS

I, ANN SUMMERS, declare under penalty of perjury under the laws of the State of
Washington as follows:

1. I am a King County Senior Deputy Prosecuting Attorney and one of the assigned

attorneys for King County Sheriff Patti Cole-Tindall and King County Prosecuting

1 Attorney Dan Satterberg in this case. I am over eighteen years of age. I have
2 personal knowledge of the facts contained in this declaration and am otherwise
3 competent to testify to the matters in this declaration.

- 4 2. On July 20, 2022, I viewed the website for Plaintiff Rainier Arms at
5 <https://www.rainierarms.com>. The contact information posted on the home page of
6 the website lists the address of Rainier Arms as 2504 Auburn Way N., Auburn,
7 Washington.
- 8 3. On July 19, 2022, I viewed the Washington Secretary of State website at
9 <https://www.sos.was.gov>. I used the “business search” function to search for the
10 registered address of Rainier Arms, LLC. The principal office street address of
11 Rainier Arms, LLC, as registered with the Secretary of State is 2504 Auburn Way N.,
12 Auburn, WA 98002.
- 13 4. On July 20, 2022, I viewed the City of Auburn website at <https://www.auburnwa.gov>.
14 I accessed the “City Limit Tool” located at
15 [https://www.auburnwa.gov/city_hall/community_development/permits_licenses_insp](https://www.auburnwa.gov/city_hall/community_development/permits_licenses_inspections/city_limit_tool)
16 [ections/city_limit_tool](https://www.auburnwa.gov/city_hall/community_development/permits_licenses_inspections/city_limit_tool). I entered the address “2504 Auburn Way N.” The result that I
17 received was that the address is within the Auburn city limits. Attached as Exhibit 1
18 is a true and correct of the map on the City of Auburn website showing that 2504
19 Auburn Way N. is within the Auburn city limits.

20 I declare under penalty of perjury under the laws of the State of Washington that the
21 foregoing is true and correct to the best of my knowledge.
22
23

1 Signed this 21st day of October, 2022 at Seattle, Washington.

2 

3
4 ANN M. SUMMERS

Exhibit 1

